

**EXHIBIT F**

#261

Exh. b.1

United States District Court

Southern District of Illinois

TERRELL TAYLOR,

Plaintiff,

v.

Haynes,

Defendant.

Case No: 23-cv-3019-JPG

2. State with specificity what damages you are claiming in this lawsuit, if you are alleging you sustained personal injuries, provide a fair description of the nature and extent of such injuries. Provide a computation of each category of damages claimed by you, and a description of the documents or other evidentiary material on which it is based, including materials bearing on the nature and extent of the injuries allegedly sustained by you.

Answer: As a result of the misconduct described in the complaint, plaintiff experienced humiliation, emotional distress, pain and suffering. Plaintiff was also physically injured as a result of the conduct described in the complaint. Physical injuries: left eye brow lac, facial contusion, left nasal fracture. Those injuries are and were recorded while at the SIH Hearin Hospital.

Plaintiff demands the following relief:

- A.) Compensatory damages in the amount of \$500,000.00
- B.) Punitive damages in the amount of \$100,000,000.00
- C.) emotional damages in the amount of \$150,000,000.00
- D.) Nominal damages in the amount of \$1.00
- E.) Attorney's fees pursuant to 42 U.S.C. § 1988
- F.) An award of plaintiff's cost of suit.
- G.) All other relief that is appropriate under the circumstances.

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3. If you are alleging you sustained physical, emotional or mental injuries, identify any physician, medical or mental health provider or professional, hospital or clinic where you received treatment, the date(s) of each such visit and the amount of any bills (a) rendered to you, and (b) paid by you as a result of said visits.

Answer: For physical injuries, I was seen and treated at the SIH Herrin Hospital on the 12th day of May, 2023 by (physician) Chanle T Trinh, MD.

Due to incarceration, I see Dr. Weber for trauma/t issues concerning the misconduct in the complaint.

4. State whether you have applied for disability benefits and/or social security benefits after January 1, 2021; whether any application has been granted; and the nature of the award, if any. Identify any document concerning any such application.

Answer: Plaintiff objects to this interrogatory as vague and ambiguous, overly broad as to scope and time, disproportionate to the needs of the case, and assumes facts not in evidence.

5. For purposes of mandatory insurer reporting under Section 111 of the Medicare, Medicaid, and SCHIP Extension Act of 2007, are you currently receiving Medicare benefits or have you ever received Medicare benefits? If so, please state your Medicare health insurance claim number. If you are not currently a Medicare beneficiary, do you reasonably expect to become a Medicare beneficiary within 30 months after the

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ANSWER: Plaintiff objects to this interrogatory as vague and ambiguous, overly broad as to scope and time disproportionate to the needs of the case.

6. State all income, earned and unearned, received by you, from January 1, 2021, to present, and identify the source or sources of any such income?

ANSWER: Plaintiff objects this interrogatory as vague and ambiguous, overly broad as to scope and time, disproportionate to the needs of the case.

7. Have you ever filed any other suit or made any other claim (including worker's compensation) for personal injuries? If so, state:

- a. The court, commission, or insurance company in which the suit or claim was filed or made;
- b. The year in which each claim or suit was made or filed;
- c. The title and docket number of each claim or suit.
- d. The name and address of any attorney representing you.

ANSWER: NO

8. Identify any evidence that supports your claim that defendant Austin Haynes violated your rights under federal or state law.

ANSWER: the 4<sup>th</sup>, 8<sup>th</sup>, 14<sup>th</sup> amendments

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9. I identify any evidence that supports your claim that defendant Johnathan Davis violated your rights under Federal or state law.

ANSWER: yes, yes, 14th amendment

10. I identify any evidence that supports your claim that defendant Todd Hunter violated your rights under Federal or state law.

ANSWER: yes, yes, 14th amendment

11. I identify any evidence that supports your claim that defendant Ryan Fosse violated your rights under Federal or state law.

ANSWER: yes, yes, 14th amendment

12. I identify any evidence that supports your claim that defendant Amy Bandy violated your rights under Federal or state law.

ANSWER: yes, yes, 14th amendment

13. I identify any evidence that supports your claim that defendant Chad Havens violated your rights under Federal or state law.

ANSWER: yes, yes, 14th amendment

14. I identify any evidence that supports your claim that defendant Dennis Pickerton violated your rights under Federal or state law.

ANSWER: yes, yes, 14th amendments

Respectfully Submitted,

TERRELL TAYLOR

TERRELL TAYLOR, 47048-044  
Federal Correction Institution  
P.O. Box 1500  
El Reno, OK 73036

DATE:

06-26-2025

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